

The Honorable Timothy W. Dore  
Chapter 7  
Hearing Date: Friday, Sept. 11, 2020  
Hearing Time: 9:30 A.M.  
Location: Seattle - Telephonic  
Dial: 1-888-363-4749  
Enter Access Code: 2762430#  
Press the # sign  
Enter Security Code: 5335#  
Response Date: Sept. 4, 2020

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

NICHOLAS CLIFTON BARNARD,

Debtor.

Case No. 16-11870 TWD

DECLARATION OF NICHOLAS C.  
BARNARD SUPPORTING HIS  
MOTION TO REDEEM  
PERSONAL PROPERTY

I, Nicholas Clifton Barnard, declare under penalty of perjury pursuant to the laws of the state of Washington as follows:

1. I am over 18 years old and am competent to testify. I am the Debtor in the above-reference matter and make the following declaration based upon my personal knowledge and belief.

2. Kelly Blue Book values my 2013 Ford C-Max Energi, VIN: 1FADP5CU7DL531019 (the "Property"), based on good condition and a private party sale at between \$4,610 and \$7,337. A true and correct copy of the Kelly Blue Book estimate is attached as **Exhibit A**.

Barnard Declaration Re: Redemption - 1

**KAPLAN LAW PLLC**  
2155 - 112<sup>th</sup> Ave. NE  
Bellevue, WA 98004  
Phone: 425-818-4818  
Fax: 425-444-4444

1           3.       Kelly Blue Book defines “good” condition as “[h]as some repairable cosmetic  
2 defects and is free of major mechanical problems.” *KBB.com*. The Property is not currently  
3 in “good” condition as it has substantial damage. It will cost approximately \$4,937 to repair  
4 the current damage and render the Property in “good” condition as defined by Kelly Blue  
5 Book. A true and correct copy of a repair estimate I obtained from Fix Auto Kenmore is  
6 attached as **Exhibit B**.

7           4.       I determined the “Redemption Value,” as defined in my Motion to Redeem  
8 Personal Property, of \$2,400 by subtracting the repair estimate from the top end value of the  
9 Kelly Blue Book “good” condition for a private party sale.

10  
11                   SIGNED this 15<sup>th</sup> day of August 2020 at Seattle, Washington.

12  
13                                   /s/ Nicholas Barnard  
14                                   Nicholas Clifton Barnard

# **EXHIBIT A**



**NIRO**

AVAILABLE WIRELESS PHONE CHARGER

DISCLAIMER



GIVE IT

Advertisement

My Car's Value

**2013 Ford C-MAX Energi** SEL Wagon 4D

near **Seattle, WA 98101** Mileage: **118,962** [Edit Options](#)

4.5 ★ (44 Ratings) [Write a review](#)

## 1 Compare Your Values

Use these values to help make a confident decision on whether to sell, trade or donate your car.

Instant Cash Offer

Trade-in

**Private Party**

Donate Your Car



**9 Recalls Found**  
[Is my car affected?](#)



**Service & Repair Estimator**  
[What's a fair price?](#)  
Next Service: **120,000**

USAA HOME & AUTO INSURANCE  
**GET THE COVERAGE YOU NEED  
AND DISCOUNTS YOU DESERVE** [AdChoice](#) [BUNDLE & SAVE](#) Ad

Private Party Range  
**\$4,610 - \$7,337**

Private Party Value  
**\$5,974**

[Important info  
& definitions](#)

Condition: **Good**

Valid for ZIP Code **98101** through **08/10/2020**

4.5 ★ (44 Ratings)

### Private Party Value

Leverage this value to set your price and negotiate with private-party buyers.

Average Time to Sell:

**30  
DAYS**

How Much to Expect:

**\$\$\$\$**

Level of Effort:

**High**

# **EXHIBIT B**



# FIX AUTO KENMORE

Workfile ID: d7f5d1c0  
PartsShare: 5TLCnR

Committed to Excellence  
6722 Bothell Way NE, Kenmore, WA 98028  
Phone: (425) 487-2600  
FAX: (425) 486-6260

## Estimate

### RO Number:

Customer:	Insurance:	Adjuster:	Estimator:	Raymon Bonner
BARNARD, NICHOLAS	pp	Phone:	Create Date:	7/17/2020
6806 OSWEGO PL NE, 101		Claim: PP		
SEATTLE, WA 98115		Loss Date:		
(206) 457-6045		Deductible:		

2013 FORD C-Max Energi SEL 4D H/B 4-2.0L Hybrid Electronic Fuel Injection white

VIN: 1FADP5CU7DL531019	Interior Color:	Mileage In: 118,183	Vehicle Out:
License:	Exterior Color: white	Mileage Out:	
State:	Production Date: 3/2013	Condition:	Job #:

Line	Ver	Operation	Description	Qty	Extended Price \$	Part Type	Labor	Type	Paint
1	E01		<b>FRONT BUMPER &amp; GRILLE</b>						
2	E01	Repair	Bumper cover w/o tow hook				3.0T	Body	2.8T
3	E01		Add for Three Stage						2.0T
4	E01	Remove/Replace	RT Side retainer	1	15.07T	OEM	0.2T	Body	
5	E01	Overhaul	O/H bumper assy			OEM	2.9T	Body	
6	E01	Remove/Install	Lower deflector				0.0T	Body	
7	E01		<b>FRONT LAMPS</b>						
8	E01	Remove/Install	RT Headlamp assy				0.3T	Body	
9	E01		<b>FENDER</b>						
10	E01	Repair	RT Fender (HSS)				3.0T	Body	1.8T
11	E01		Add for Three Stage						1.3T
12	E01	Remove/Install	RT Ft fender liner				0.4T	Body	
13	E01		<b>PILLARS, ROCKER &amp; FLOOR</b>						
14	E01	Remove/Install	RT Vent glass FORD w/chrome molding				1.1T	Body	
15	E01		urethane kit	1	15.00T	Other			
16	E01	Blend	RT outer roof rail						0.5T
17	E01		<b>FRONT DOOR</b>						
18	E01	Repair	RT Outer panel				3.5T	Body	2.1T
19	E01		Overlap Major Adj. Panel						(0.4)T
20	E01		Add for Three Stage						0.7T
21	E01	Remove/Install	RT Belt w'strip bright				0.2T	Body	
22	E01	Remove/Install	RT Nameplate "ENERGI"				0.2T	Body	
23	E01		clean and retape	1	5.00T	Other	0.2T	Body	
24	E01	Remove/Replace	RT Nameplate "C-MAX"	1	61.81T	OEM	0.2T	Body	

T = Taxable Item, RPD = Related Prior Damage, AA = Appearance Allowance, UPD = Unrelated Prior Damage, PDR = Paintless Dent Repair, A/M = Aftermarket, Rechr = Rechromed, Reman = Remanufactured, OEM = New Original Equipment Manufacturer, Recor = Re-cored, RECOND = Reconditioned, LKQ = Like Kind Quality or Used, Diag = Diagnostic, Elec = Electrical, Mech = Mechanical, Ref = Refinish, Struc = Structural

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**RO Number:**

2013 FORD C-Max Energi SEL 4D H/B 4-2.0L Hybrid Electronic Fuel Injection white

25	E01	Remove/Install	RT R&I mirror				0.3T	Body	
26	E01		remove adhesive from door	1	2.00T	Other	0.2T	Body	
27	E01	Remove/Install	RT Handle, outside w/keyless start				0.4T	Body	
28	E01	Repair	RT Handle, outside w/keyless start				1.0T	Body	0.5T
29	E01		Overlap Minor Panel						(0.2)T
30	E01		Add for Three Stage						0.1T
31	E01	Remove/Install	RT R&I trim panel				0.6T	Body	
32	E01		<b>REAR DOOR</b>						
33	E01	Repair	RT Outer panel				2.0T	Body	2.1T
34	E01		Overlap Major Adj. Panel						(0.4)T
35	E01		Add for Three Stage						0.7T
36	E01	Remove/Install	RT Belt w'strip bright				0.2T	Body	
37	E01	Remove/Install	RT Handle, outside w/o keyless start				0.4T	Body	
38	E01	Remove/Install	RT R&I trim panel				0.5T	Body	
39	E01		<b>QUARTER PANEL</b>						
40	E01	Repair	RT Quarter panel				6.5T	Body	2.3T
41	E01		Overlap Major Adj. Panel						(0.4)T
42	E01		Add for Three Stage						0.8T
43	E01	Blend	Fuel door						0.2T
44	E01	Remove/Install	Fuel door				0.1T	Body	
45	E01	Remove/Install	RT Splash shield to 02/04/2018				0.3T	Body	
46	E01	Remove/Replace	RT Stone guard			OEM	0.3T	Body	
47	E01	Remove/Install	RT Pillar trim				0.2T	Body	
48	E01	Remove/Install	RT Qtr glass Ford bright frame NOTE: LABOR: Time is after pillar trim and trunk side trim are removed.				1.3T	Body	
49	E01		urethane kit	1	15.00T	Other			
50	E01	Remove/Install	RT Upper trim				0.1T	Body	
51	E01	Repair	LT Quarter panel				3.0T	Body	2.3T
52	E01		Overlap Major Non-Adj. Panel						(0.2)T
53	E01		Add for Three Stage						0.8T
54	E01	Remove/Install	LT Splash shield to 02/04/2018				0.3T	Body	
55	E01	Remove/Install	LT Qtr glass Ford black frame				1.3T	Body	
56	E01		urethane kit	1	15.00T	Other			
57	E01	Remove/Install	LT Pillar trim				0.2T	Body	
58	E01		<b>REAR BODY &amp; FLOOR</b>						
59	E01	Remove/Install	RT Trunk side trim				0.4T	Body	
60	E01	Remove/Install	LT Trunk side trim				0.4T	Body	
61	E01		<b>REAR LAMPS</b>						
62	E01	Remove/Install	RT Tail lamp assy				0.3T	Body	
63	E01		<b>REAR BUMPER</b>						
64	E01	Remove/Install	R&I bumper cover				1.0T	Body	
65	E01	Repair	Bumper cover				3.0T	Body	2.8T
66	E01		Add for Three Stage						2.0T

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# Estimate

## RO Number:

2013 FORD C-Max Energi SEL 4D H/B 4-2.0L Hybrid Electronic Fuel Injection white

67	E01	Remove/Install	Valance				0.4T	Body
68	E01	Remove/Install	Park sensors				0.4T	Body
69	E01	Repair	Scan for diagnostic trouble codes at completion of repairs				0.5T	Mech
70	E01	Remove/Replace	Cover vehicle	1	5.00T	Other	0.3T	Body
71	E01	Remove/Replace	Corrosion protection	1	8.00T	Other	0.3T	Body
72	E01	Remove/Replace	Flex additive	1	5.00T	Other		

Estimate Totals	Discount \$	Markup \$	Rate \$	Total Hours	Total \$
Parts					146.88
Labor, Body			54.00	40.9	2,208.60
Labor, Refinish			54.00	24.2	1,306.80
Labor, Mechanical			103.00	0.5	51.50
Material, Paint			32.00	24.2	774.40
<b>Subtotal</b>					<b>4,488.18</b>
Sales Tax					448.82
<b>Grand Total</b>					<b>4,937.00</b>
<b>Net Total</b>					<b>4,937.00</b>

Estimate Version	Total \$
Original	4,937.00

Insurance Total \$:	4,937.00
Received from Insurance \$:	0.00
Balance due from Insurance \$:	4,937.00
Customer Total \$:	0.00
Received from Customer \$:	0.00
Balance due from Customer \$:	0.00

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